

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL E. HOGG,)	
)	
Plaintiff,)	
)	
v.)	Case No. 18 CV 5421
)	
ALEX JONES,)	(Case Pending in the Circuit Court of
INFORWARSTORE.COM,)	Cook County, Illinois, County
GLOBAL HEALING CENTER, and)	Department, Law Division,
DR. EDWARD GROUP,)	Case No. 2017 L 062046)
)	
Defendants.)	

NOTICE OF REMOVAL

TO: HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

Defendants, PQPR Holdings Limited, LLC (“PQPR Holdings”)(*incorrectly named and sued as INFOWARSSTORE.COM*) and Alex Jones (“Mr. Jones”), by their attorneys, James A. Foster and Alexandra N. Reitzner (Cassiday Schade LLP, *of counsel*), and Global Healing Center, LP (“Global Healing”) and Dr. Edward Group (“Dr. Group”), by their attorneys, David S. Waxman and Sharilee K. Smentek (Saul Ewing Arnstein & Lehr LLP, *of counsel*), pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1446, hereby remove the above entitled action. In support of this removal, defendants state as follows:

1. On August 15, 2017, defendants were named as defendants in a civil action filed by plaintiff, Michael E. Hogg, in the Circuit Court of Cook County, Illinois, styled *Michael E. Hogg v. Alex Jones, Infowarsstore.com, Global Healing Center, and Dr. Edward Group*, Case No. 2017 L 062046.

2. On or about January 26, 2018, plaintiff caused to have Alias Summons issued to all defendants.

3. Thereafter, plaintiff attempted to serve defendants with a copy of the Complaint and Alias Summons in the state court action.

4. On July 18, 2018, the court in the state court action quashed service on all defendants. To date, none of the defendants have been served with process.

5. This Notice of Removal is filed prior to the date of proper service on defendants of the initial pleadings setting forth the claim for relief upon which the state court action is based, as required by 28 U.S.C. § 1446(b).

6. As required by 28 U.S.C. § 1446(c)(1), a case must be removed on the basis of diversity jurisdiction within one year from commencement of the action. Thus, the deadline to remove this action is August 15, 2018.

7. PQPR Holdings and Mr. Jones are represented by James A. Foster and Alexandra N. Reitzner of Cassiday Schade LLP and consent to removal of this action.

8. Global Healing and Dr. Group are represented by David S. Waxman and Sharilee K. Smentek of Saul Ewing Arnstein & Lehr LLP and consent to removal of this action.

9. Copies of all process and pleadings provided to defendants in the state court action are attached as Group Exhibit A, as required by 28 U.S.C. § 1446(b).

10. This Court has jurisdiction over the above-described action pursuant to 28 U.S.C. § 1332 and 1441 because:

(a) Plaintiff is a citizen of the State of Illinois. At the time of filing his Complaint, and at the time of filing Defendants' Notice of Removal, plaintiff was/is domiciled in Illinois. He has resided, and currently resides, in the city of Glenview, Cook County, Illinois, and upon information and belief intends to remain there indefinitely. Plaintiff has effectively admitted that he is and was a citizen of the State of Illinois by failing to timely respond to Global Healing and Dr. Group's Removal Requests to Admit to

Plaintiff. A copy of Global Healing and Dr. Group's Removal Requests to Admit to Plaintiff are attached as Exhibit B;

(b) PQPR Holdings Limited, LLC is a Nevada limited liability company, with its principal place of business in Texas. *See* PQPR Holdings Limited, LLC's Office of the Texas Comptroller page, attached as Exhibit C. The members of PQPR Holdings Limited, LLC are JLJR Holdings, LLC and PLJR Holdings, LLC, both of which are Nevada limited liability companies and have their principal places of business in Texas. *See* PQPR Holdings Limited, LLC Nevada Business Portal Page, attached as Exhibit D. The members of JLJR Holdings, LLC and PLJR Holdings, LLC, are individuals. Each individual is a citizen of Texas in that they resided, and currently reside, in Texas, and intend to remain there indefinitely. The individuals are not citizens of Illinois.

(c) Mr. Jones is a citizen of the State of Texas. He has resided, and currently resides, in Texas, and intends to remain there indefinitely.

(d) Global Healing is a Texas limited partnership. Global Healing's sole general partner is GHC ND Holdings, LLC, which is a Texas limited liability company. The sole manager of GHC ND Holdings, LLC is Aqualight Limited, a Delaware Limited Partnership. The sole general partner of Aqualight Limited is Dr. Group who, as described below, is a citizen of the State of Texas.

(e) Dr. Group is a citizen of the State of Texas. He has resided, and currently resides, in Texas, and intends to remain there indefinitely.

(f) Plaintiff seeks damages in excess of One Million and 00/100 (\$1,000,000.00) Dollars, which exceeds the amount in controversy requirement; and

(g) Because there is diversity of citizenship between the parties and the jurisdictional amount is satisfied, this Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332(a), and the action is properly removable under 28 U.S.C. § 1441(a).

11. This Notice of Removal is being filed within thirty (30) days of the due date for Plaintiff's response to Global Healing and Dr. Group's Removal Requests to Admit to Plaintiff (i.e., July 19, 2018), which demonstrated for the first time that Plaintiff is and was a citizen of the State of Illinois. *See* Exhibit B. Thus, this Notice of Removal is being timely filed. *See* 28 U.S.C. § 1446.

12. This Court is the United States District Court for the Northern District of Illinois, Eastern Division, embracing Cook County, Illinois, in which the state court action is currently

pending. Defendants expressly reserve the right to raise all defenses and objections including lack of jurisdiction, lack of venue, and lack of proper service of process in this action after the action has been removed to this Court.

13. In accordance with 28 U.S.C. § 1446(d), written notice of the filing of this notice of removal will be served promptly on all adverse parties and will be filed with the Clerk of the Circuit Court of Cook County.

WHEREFORE, Defendants, PQPR Holdings Limited, LLC (*incorrectly named and sued as INFOWARSSTORE.COM*), Alex Jones, Global Healing Center, LP and Dr. Edward Group, respectfully request that the above-entitled action be removed from the Circuit Court of Cook County, Illinois to this Court.

Respectfully submitted,

James A. Foster
Alexandra N. Reitzner
Cassiday Schade LLP
222 W. Adams St.
Suite 2900
Chicago, IL 60606
jfoster@cassiday.com
areitzner@cassiday.com

PQPR HOLDINGS LIMITED, LLC
(*incorrectly named and sued as*
INFOWARSSTORE.COM)
and ALEX JONES,

By: /s/ Alexandra N. Reitzner
One of their attorneys

David S. Waxman (ARDC # 6191045)
Sharilee K. Smentek (ARDC # 6277773)
Saul Ewing Arnstein & Lehr LLP
161 N. Clark Street, Suite 4200
Chicago, Illinois 60601
(312) 876-7100
david.waxman@saul.com
sharilee.smentek@saul.com

GLOBAL HEALING CENTER, LP and DR.
EDWARD GROUP,

By: /s/ Sharilee K. Smentek
One of their attorneys

CERTIFICATE OF SERVICE

Sharilee K. Smentek, an attorney, certifies that she served the foregoing Notice of Removal to the United States District Court on the parties listed below on August 9, 2018.

Clerk of the Circuit Court
Richard J. Daley Center, Room 1001
50 West Washington Street
Chicago, Illinois 60602

via electronic delivery, and

Frank Avila
Avila Law Group
7132 N. Harlem Ave.
Suite 107
Chicago, IL 60631
frankavilalaw@gmail.com

via email and U.S. Mail.

s/ Sharilee K. Smentek